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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. CR 09-0862 MHP
	(	
Plaintiff,	)	
	(	STIPULATION AND { <del>PROPOSED</del>
vs	)	<del>ORDER</del> } MODIFYING CONDITIONS
	(	OF THE PRE-TRIAL RELEASE
TAPANI KOIVUNEN, et al	)	
	(	
Defendants.	)	
	(	
	)	

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WHEREAS, defendant TAPANI KOIVUNEN, is charged in a criminal indictment now pending in the captioned matter, and

WHEREAS, defendant was released on bail of \$300,000.00 cash, and in addition to the usual conditions of release he was required to remain in his residence and be under the

supervision of “electronic monitoring” and have a third party custodian, his daughter, LAURA KOIVUNEN, and

WHEREAS, LAURA KOIVUNEN has scheduled a trip to Finland between September 4, 2010 and September 19, 2010, to visit family and friends, and

WHEREAS, PIETARI GROHN, a California lawyer and friend of defendant KOIVUNEN, has agreed to assume the responsibilities of “Custodian Monitoring”:during Laura Koivunen’s absence. Mr. Grohn lives within a few blocks of Mr. Koivunen and is known to Pre-trial Services as a lawyer who has been assisting Mr. Koivunen in this case. He has agreed to check in with Mr. Koivunen on a regular basis and to report any violation of Mr. Koivunen’s bail conditions immediately to Pre-trial Services, and

WHEREAS, this temporary modification of release conditions has been discussed with Pre-trial Service Officer Richard Sarlatte and Assistant United States Attorney, Andrew Caputo,. and they are agreeable to these changes provided the Court is agreeable.

THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto, that LAURA KOIVUNEN may travel to Finland between September 4 , 2010, and September 19, 2010, and that PIETARI GROHN may be substituted as temporary personal custodian of defendant during this time frame under the direction of

Pre-trial Services.

DATED:

August 24, 2010

/s/

HARRY C. SINGER

Attorney for Defendant TAPANI KOIVUNEN

DATED:

August 24 , 2010

/s/

ANDREW P. CAPUTO

Assistant United States Attorney

Attorney for Plaintiff

IT IS SO ORDERED:

August 27 2010

Magistrate Judge, Edward M.

